

**THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**In re:**

**HYDROCARB ENERGY  
CORPORATION,**

**GALVESTON BAY ENERGY, LLC,**

**DEBTORS.**

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**Case No. 16-31922  
(Chapter 7)**

**Case No. 16-31923  
(Chapter 7)**

**Jointly Administered Under  
Case No. 16-31922**

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**TRUSTEE'S MOTION TO AUTHORIZE ALLOCATION  
OF FUNDS AMONG THE JOINTLY ADMINISTERED ESTATES**

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**This motion seeks an order that may adversely affect you. If you oppose the motion, you should immediately contact the moving party to resolve the dispute. If you and the moving party cannot agree, you must file a response and send a copy to the moving party. You must file and serve your response within 21 days of the date this was served on you. Your response must state why the motion should not be granted. If you do not file a timely response, the relief may be granted without further notice to you. If you oppose the motion and have not reached an agreement, you must attend the hearing. Unless the parties agree otherwise, the court may consider evidence at the hearing and may decide the motion at the hearing.**

**Represented parties should act through their attorney.**

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**TO THE HONORABLE DAVID JONES UNITED STATES BANKRUPTCY JUDGE:**

Rodney Tow, Trustee, and files this Trustee's Motion to Authorize Allocation of Funds to the Jointly Administered Estates and would show the Court the following:

1. These estates have been jointly administered since the inception of the two cases. As a result, the Trustee only opened one bank account for both estates. Through this Motion,

the Trustee seeks authorization to allocate receipts and disbursements between the two estates so that the Trustee can separate the bank account into an account for Hydrocarb and an account for Galveston Bay..

### **Jurisdiction and Venue**

2. This is a core matter under 28 U.S.C. §157(b)(2)(A). Venue is proper under 28 U.S.C. §1408.

### **Process of Allocating Receipts and Disbursements**

3. Exhibit A shows all receipts and disbursements in the Hydrocarb account which holds both Galveston Bay and Hydrocarb funds.
4. Exhibit B shows the receipts allocated to each estate. Galveston Bay is shown with \$3,636,897.61 in receipts and Hydrocarb is shown with \$95,152.84 in receipts. These two add up to \$3,732,050.45 which is the total of receipts shown in Exhibit A.
5. Exhibit C shows the disbursements allocated to each estate. Galveston Bay is shown with \$3,385,809.45 in disbursements and Hydrocarb is shown with \$22432.65 in disbursements. These two add up to 3,408,242.10 which is the total of disbursements shown in Exhibit A.
6. As a result of the allocation, the Hydrocarb balance as of December 20, 2016 is \$72,720.19 and the Galveston Bay balance as of December 20, 2016 is \$251,088.16.
7. The Trustee seeks authorization to transfer \$251,088.16 from the Hydrocarb account to the Galveston Bay account. In the event the Trustee is required to issue a disbursement for Galveston Bay between now and the entry of the order or receives a Galveston Bay receipt, this amount will vary according to the amount of the check or deposit.

Based on the foregoing, Rodney Tow, Trustee, moves this Court to authorize him to transfer \$251,088.16 from the Hydrocarb estate to the Galveston Bay estate and for such other and further relief that he may be justly entitled.

Respectfully Submitted:

BY: /s/ Rodney Tow

**RODNEY TOW, TRUSTEE**

Texas Bar No. 2012500

SDTX Bar No. 3196

1122 Highborne Cay Court

Texas City, Texas 77590-1403

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the Trustee's Motion to Authorize Allocation of Funds to the Jointly Administered Estates to the parties on the attached service list via regular first class U.S. mail postage prepaid or ECF notification.

Signed this the 20th day of December, 2016.

/s/ Rodney Tow

**Rodney Tow**

Label Matrix for local noticing 0541-4 Case 16-31922 Southern District of Texas Houston Tue Dec 20 14:51:16 CST 2016	Archrock Partners Operating, L.L.C. 16666 North Chase Dr. Houston, TX 77060-6014	Cameron International Corporation c/o Carl Dore', Jr. Dore' Law Group, P.C. 17171 Park Row, Suite 160 Houston, TX 77084-4927
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Mailable recipients	124
Bypassed recipients	15
Total	139

Label Matrix for local noticing  
0541-4  
Case 16-31923  
Southern District of Texas  
Houston  
Tue Dec 20 14:52:36 CST 2016

~~Kinder Morgan Tejas Pipeline, LLC~~  
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P.O. Box 248869  
Oklahoma City, OK 73124-8869

Kinder Morgan Tejas Pipeline  
Dept. 3015  
PO Box 201607  
Dallas, TX 75320-1607

Kinder Morgan Tejas Pipeline, LLC  
c/o Law Ofc Patricia Williams Prewitt  
10953 Vista Lake Ct.  
Navasota, TX 77868-6981

~~Line Gulf Coast Petroleum, Inc.~~  
~~1000 Louisiana Street~~  
~~Suite 1500~~  
~~Houston, TX 77002-5018~~

Lone Star Diving Services, Inc.  
5321 Avenue E  
Santa Fe, TX 77510-7701

MG&G Pump Company, Inc.  
110 Herman Drive  
Belle Chasse, LA 70037-3204

Marion J. Zabranek, Jr.  
PO Box 581  
Liberty TX 77575-0581

Matador Environmental Services, LLC dba  
Frost Bank  
P. O. Box 610451  
Dallas, TX 75261-0451

Moncla E-Line Services, Inc. Mid South B  
P.O. Box 3307  
Lafayette, LA 70502-3307

~~Moncla Marine Operations, LLC~~  
~~P.O. Box 53408~~  
~~Lafayette, LA 70505-3408~~

~~Newpark Drilling Fluids LLC~~  
~~c/o R. Alex Weatherford~~  
~~Dore' Law Group, P.C.~~  
~~17171 Park Row, Suite 160~~  
~~Houston, Texas 77084-4927~~

~~Newpark Drilling Fluids, LLC~~  
~~P.O. Box 973167~~  
~~Dallas, TX 75397-3167~~

(p)O REILLY AUTOMOTIVE INC  
P O BOX 1156  
SPRINGFIELD MO 65801-1156

~~Oil States Energy Services LLC~~  
~~Grant P. Harpold~~  
~~2229 San Felipe Ste 1000~~  
~~Houston TX 77019-5639~~

Oil States Energy Services, LLC  
PO Box 203567  
Dallas, TX 75320-3567

~~Oilfield Instrumentation~~  
~~P.O. Box 51902~~  
~~Lafayette, LA 70505-1902~~

Paul Blasingame  
c/o Doyle LLP  
3401 Allen Parkway, 77019

~~Peninsula Marine Inc~~  
~~PO Box 501~~  
~~Port Bolivar, TX 77650-0501~~

Petrophysics, Inc.  
P.O. Box 863323  
Plano, TX 75086-3323

Precision Wireline Services, LLC  
P.O. Box 51371  
Lafayette, LA 70505-1371

Premium Oilfield Services, LLC  
P.O. Box 203763  
Dallas, TX 75320-3763

Pressure Control Specialists  
P.O. Box 80613  
Lafayette, LA 70598-0613

Priority Artificial Lift Services, LLC  
5655 W. Sam Houston Parkway N.  
Houston, TX 77041-5148

Priority Energy Holdings, LLC dba Priori  
P.O. Box 54465  
New Orleans, LA 70154-4465

Pro-Gas Services, LLC  
5613 DTC Parkway  
Suite 310  
Greenwood Village, CO 80111-3031

Progressive Diesel Red, Inc.  
8311 Industrial Drive  
Pearland, TX 77584-3549

QES Wireline LLC  
c/o R. Alex Weatherford  
Dore' Law Group, P.C.  
17171 Park Row, Suite 160  
Houston, Texas 77084-4927

~~Railroad Commission of Texas~~  
~~Attn: Oil and Gas Division~~  
~~PO Box 12967~~  
~~Austin, TX 78711-2967~~

Ralph E. Davis & Associates  
1717 St. James Place  
Suite 460  
Houston, TX 77056-3496

Ross B. Jordan dba Jordan Oilfield Servi  
P.O. Box 286  
Batson, TX 77519-0286

S&S Operating Co., Inc  
PO Box 1250  
Winnie, TX 77665-1250

SLR International Corporation  
22118 20th Avenue S.E.  
Suite G-202  
Bothell, WA 98021-4434

Sabine Environmental Services, LLC  
c/o Brian Deitch  
The Deitch Law Offices  
800 Rio Grande  
Austin, Texas 78701-2220

Scott, Douglas & McConnico, L.L.P. Attor  
303 Colorado Street  
Suite 2400  
Austin, TX 78701-4654

Securities and Exchange Commission  
Washington, DC 20549-0001

Smart Materials, Inc.  
1404 Wallisville Road  
Liberty, TX 77575-9145

Smart Oilfield Services LLC  
PO Box 3002  
Liberty, TX 77575-2102

Spring Branch ISD L.A. Payton, Tax Asses  
P.O. Box 19037  
Houston, TX 77224-9037

Spring Branch Independent School District  
P.O. Box 19037  
Houston, TX 77224-9037

Stabil Drill Specialties, LLC Stabil Dri  
Dept. 2162  
P.O. Box 122162  
Dallas, TX 75312-2162

Stokes & Spiehler Offshore, Inc.  
PO Box 52006  
Lafayette, LA 70505-2006

Streamline Production Systems Inc.  
c/o Brian E Bro  
3111 Wood Park  
Sugar Land, TX 77479

~~Sun Coast Resources, Inc.~~  
~~P. O. Box 202603~~  
~~Dallas, TX 75320-2603~~

Superior Energy Services LLC  
Dept 2203  
PO Box 122203  
Dallas, TX 75312-2203

Superior Vacuum Services, LLC  
P.O. Box 320  
Hardin, Texas 77561-0320

TCEQ  
P.O. Box 13089  
Austin, TX 78711-3089

THE HARTFORD  
P. O. Box 660916  
Dallas, TX 75266-0916

Texas Commission on Environmental Quality  
MC 132- Bankruptcy Program  
PO Box 13087  
Austin, Tx. 78711-3087

Texas General Land Office  
P.O. Box 12873  
Austin, TX 78711-2873

~~Texas General Land Office~~  
~~Petroleum and Minerals Division~~  
~~1700 North Congress~~  
~~Austin, TX 78701-1436~~

~~Texas Workforce Commission~~  
~~Regulatory Integrity Division - SAU~~  
~~Room 556~~  
~~101 E. 15th Street~~  
~~Austin, TX 78778-0010~~

Trend Services Inc.  
P.O. Box 747  
Broussard, LA 70518-0747

Trinity Consultants  
Attn: Christine Phillips  
PO Box 972047  
Dallas, TX 75397-2047

Trinity Tubing Testers, Inc.  
PO Box 581  
Liberty, TX 77575-0581

Triple S Steel Supply, LLC  
PO Box 21119  
6000 Jensen Dr  
Houston, TX 77026-1113

Twin Tank Co. Inc.  
P.O. Box 1502  
Stafford, TX 77497-1502

U.S. Coast Guard Civil Penalties  
P.O. Box 531112  
Atlanta, GA 30353-1112

~~US Trustee~~  
~~Office of the US Trustee~~  
~~515 Rusk Ave~~  
~~Ste 3516~~  
~~Houston, TX 77002-2604~~

UV Logistics LLC DBA United Vision Logistics  
United Vision Logistics  
PO Box 81008  
Lafayette, LA 70598-1008

UV Logistics LLC UNited Vision Logistics  
P.O. Box 975357  
Dallas, TX 75397-5357

~~United States Trustee's Office~~  
~~515 Rusk St., Suite 3516~~  
~~Houston, TX 77002-2604~~

WR Production, LLC  
7500 San Felipe Street  
Suite 475  
Houston, TX 77063-1786

Weatherford, U.S., L.P.  
PO Box 301003  
Chase Bank of Texas  
Dallas, TX 75303-1003

Worldwide Power Products  
5711 Brittmoore  
Houston, TX 77041-5614

~~Wyatt Energy~~  
~~3355 West Alabama Street~~  
~~Houston, TX 77098-1717~~

~~David L Curry Jr~~  
~~Okin & Adams, LLP~~  
~~1113 Vine Street, Suite 201~~  
~~Houston, TX 77002-1045~~

~~Rodney D Tow~~  
~~Rodney Tow, PLLC~~  
~~1122 Highborne Cay Court~~  
~~Texas City, TX 77590-1403~~

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

~~O'Reilly Automotive, Inc.~~  
~~PO Box 9464~~  
~~Springfield, MO 65801-9464~~

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

~~(u)Shadow Tree Capital Management LLC, as Age~~

~~(d)Galveston Bay Energy, LLC~~  
~~800 Gessner Road, Suite 375~~  
~~Houston, TX 77024-4608~~

~~(d)Peninsula Marine, Inc.~~  
~~P.O. Box 501~~  
~~Port Bolivar, TX 77650-0501~~

~~(d)Christopher Adams~~  
~~Okin & Adams LLP~~  
~~1113 Vine Street~~  
~~Suite 201~~  
~~Houston, TX 77002-1045~~

~~End of Label Matrix~~  
~~Mailable recipients 134~~  
~~Bypassed recipients 4~~  
~~Total 138~~